

# **EXHIBIT 4**

**Subject:** CG3 Media et al v. Belleau: Source Code

**Date:** Monday, October 25, 2021 at 6:28:22 PM Eastern Daylight Time

**From:** Bryon Wasserman

**To:** fstephenson@keyhanillc.com

**CC:** dkeyhani@keyhanillc.com, aengel@keyhanillc.com, Etai Lahav, Paralegals

Dear Frances and Darius

We are writing regarding significant deficiencies in CG3's source code production.

First, the format in which the source code has been produced is not consistent with standard practice or your obligations under the protective order. The source code has been produced in a set of context-free paper printouts that lack file names or directory structure, instead merely presenting strings of code written on paper. This format does not meaningfully allow any identification of which files are included or how they interrelate.

Second, it is self evident that the source code is far from complete, as the source code produced includes references to values produced by other scripts that are not included, such as those listed in CG3000021. The source code does also does not include any of the third party libraries which Speakflow incorporates.

These deficiencies are particularly glaring in that CG3 has refused to respond to interrogatories asking for identification of Speakflow's components and has failed to produce any technical documents related to Speakflow's operation

Accordingly the following must be produced immediately:

1. A re-production of the code already produced with an identification of the file names of each file produced.
2. The full source code for Speakflow in electronic format in the directory structure in which it is stored in the ordinary course of business.
3. A directory listing for CG3's source code so that we can verify its completeness

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If CG3 will not agree to these terms, advise when you can meet and confer this week so that these issues can be raised with the Court.

Regards

Bryon

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